

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUTTES

VICTIM RIGHTS LAW CENTER, et al.,

Plaintiffs,

v.

U.S. DEPARTMENT OF EDUCATION,  
et al.,

Defendants.

Civil Action No. 25-11042-MJJ

**DECLARATION OF RACHEL OGLESBY**

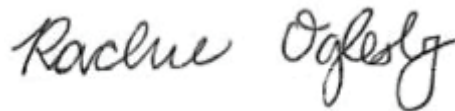
1. My name is Rachel Oglesby. I make this Declaration based on my own personal knowledge, on information contained in the records of the Department of Education, or on information provided to me by Department of Education employees.
2. I am currently employed as Chief of Staff for the U.S. Department of Education, headquartered in Washington, D.C. I began my service at the Department on January 20, 2025.
3. Before joining the Department, I worked at America First Policy Institute as the Chief State Action Officer and Director of the Center for the American Worker.
4. In my role at the Department, I have the following responsibilities:
  - a. I assist the Secretary of Education with all her responsibilities running the Department.
  - b. I advise the Secretary on significant matters within and affecting the Department.
5. I submitted declarations in the cases of *New York v. McMahon*, Case No. 25-10601-MJJ and *Somerville Public Schools v. Trump*, Case No. No. 25-10677-MJJ, on June 3, 2025, June 10, 2025, June 17, 2025, June 26, 2025, July 1, 2025, and July 8, 2025, the latter two of which included compliance information specific to the preliminary injunction issued by this Court on June 18, 2025 regarding the Department's Office for Civil Rights (the "OCR Order"). I incorporate herein by reference the statements made in my previous declarations. Due to the stay ordered by the United States Supreme Court issued on July 14, 2025, in the aforementioned *New York* and *Somerville* cases, this declaration addresses compliance activities specific to the OCR Order.

6. Senior officials from the ad hoc committee described in my earlier declarations held discussions on July 11 and July 14 addressing OCR-specific reintegration activities. By July 15, 2025, the Department had:
- Notified employees who had received RIF notices on March 11, 2025, of impending separation dates while specifying that OCR employees who received RIF notices on March 11, 2025, do not have a separation date. A true and correct copy of the communication sent to employees on July 14, 2025, is attached hereto as Exhibit A.
  - Examined the two employee surveys referenced in my prior declarations (“Outside Employment Survey” and “Employee Reintegration and Space Planning Survey”) to isolate OCR employees’ responses so that, for example, outside employment can be reviewed for compliance with applicable ethics rules, and capacity for office space in various regional offices can be assessed for OCR employees.
  - Modified the Department’s reintegration plan to focus on the OCR employees who received RIF notices on March 11, 2025, to ensure all dependencies and supporting actions are identified, including reconciling employee responses (and non-responses) to the two surveys and integrating into the reintegration plan the data provided in those responses.
    - Oriented the process of IT restoration as to government furnished equipment (GFE) to preparation for reissuing GFE to OCR employees.
    - Discussed with the OCR ad hoc committee representative reintegration strategies including IT access needs and position description modifications.
  - Ensured that OCR continues to process, investigate, and resolve complaints:
    - From March 11 to July 14, 2025, OCR received 5,515 complaints; opened 337 for investigation; opened 26 directed investigations; dismissed 3,828 complaints consistent with OCR’s Case Processing Manual; resolved 103 complaints after investigation concluded insufficient evidence for findings; and resolved 315 complaints with voluntary agreements, OCR-mediated settlements, or technical assistance from OCR to ensure a recipient’s digital resources are accessible to students with disabilities.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed in Washington, DC this 15<sup>th</sup> day of July.



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Rachel Oglesby

**From:** CHCO-Info <[workforcereshaping@ed.gov](mailto:workforcereshaping@ed.gov)>

**Sent:** Monday, July 14, 2025 4:41 PM

**To:** CHCO-Info <[workforcereshaping@ed.gov](mailto:workforcereshaping@ed.gov)>

**Subject:** Update for Employees Impacted by Reduction in Force

Dear Colleague,

Pursuant to, and consistent with, the July 14, 2025, U.S. Supreme Court decision to stay a lower court's injunction regarding federal restructuring (attached), the Department of Education is continuing with the reduction in force (RIF).

A RIF notice was previously issued to you on April 10, 2025, with an original separation date of June 10, 2025, under the required 60-day notice period. Following the Supreme Court's decision, your separation date has been adjusted to August 1, 2025. You will receive a final statement of your leave accruals and any additional payments you are entitled to under law.

OCR employees affected by the *Victim's Rights Law Center, et al. v. United States Department of Education, et al.* will be separately notified of their separation at the appropriate time.

The Department appreciates your service and recognizes the difficulty of the moment. This RIF action is not a reflection upon your performance or conduct and is solely due to agency restructuring, as described in previous correspondence.

With regard,

Jacqueline Clay

Chief Human Capital Officer

Attachment:

24A1203 McMahon v. New York, 7-14-25